

1 JASON M. FRIERSON  
United States Attorney  
2 District of Nevada  
Nevada Bar No. 7709  
3 VIRGINIA T. TOMOVA  
Assistant United States Attorney  
4 Nevada Bar Number 12504  
501 Las Vegas Blvd. So., Suite 1100  
5 Las Vegas, Nevada 89101  
(702) 388-6336  
6 [Virginia.Tomova@usdoj.gov](mailto:Virginia.Tomova@usdoj.gov)

7 *Attorneys for the Federal Defendant*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Adriana Sierra,

11 Plaintiff,

12 v.

13 United States Department of Education;  
Equifax Information Services LLC; and  
14 Experian Information Solutions, Inc.

15 Defendant.

Case No. 2:24-cv-00296-APG-MDC

**Stipulation and Order to Extend Time  
to File a Response**

**(Second Request)**

17 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of  
18 this Court's Local Rules, Plaintiff Adriana Sierra and Federal Defendant United States  
19 Department of Education, through undersigned counsel, hereby stipulate and agree as  
20 follows:

21 Plaintiff filed her complaint on February 12, 2024. ECF No. 1.

22 Plaintiff served Federal Defendant with a copy of the Summons and Complaint on  
23 February 20, 2024. ECF No. 5.

24 The current deadline for Federal Defendant to respond to Plaintiff's Complaint is  
25 May 22, 2024.

26 On May 20, 2024, counsel for Plaintiff and Federal Defendant agreed to a 30-day  
27 extension to allow additional time for Federal Defendant to retrieve all documents from the  
28

1 agency relevant to the allegations in the complaint, review them and respond to the  
2 allegations in Plaintiff's Complaint.

3 Accordingly, the parties, through undersigned counsel, submit this stipulation to a  
4 30-day extension from **May 22, 2024**, to **June 21, 2024**, for Federal Defendant to file a  
5 Response to the Complaint. This is the second request for an extension of time.

6 This stipulated request is filed in good faith and not for the purposes of undue delay.

7 Respectfully submitted this 21st day of May 2024.

8 FREEDOM LAW FIRM, LLC

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709

10 /s/ Gerardo Avalos  
11 GERARDO AVALOS, ESQ.  
Nevada Bar No. 15171  
8985 S. Eastern Ave., Suite 100  
12 Las Vegas, Nevada 89123

/s/ Virginia T. Tomova  
VIRGINIA T. TOMOVA  
Assistant United States Attorney  
Nevada Bar Number 12504

13 *Attorneys for Plaintiff*

U.S. ATTORNEY'S OFFICE  
501 S. Las Vegas Blvd., Suite 1100  
Las Vegas, Nevada 89101

*Attorneys for the Federal Defendant*

16  
17 **IT IS SO ORDERED:**

18  
19   
20 **Hon. Maximiliano D. Couvillier III**  
**UNITED STATES MAGISTRATE JUDGE**

21 **DATED: 5/22/2024**  
22  
23  
24  
25  
26  
27  
28